UNITED STATES DISTRICT COURT EASTERN DISTRICT OF OKLAHOMA

RAYMOND WALKER,)
Plaintiff,))
V.) Civil Action No. CIV-14-217-RAW
ENCORE CAPITAL GROUP, ET AL.,)
Defendants.)
)

MOTION FOR EXTENSION OF TIME BY DEFENDANTS ENCORE CAPITAL GROUP AND MIDLAND FUNDING, LLC

In accordance with LcVR 7.1(i), Defendants Encore Capital Group and Midland Funding, LLC request an extension of 14 days within which to serve an answer or other responsive pleading to the Complaint. In support of this request, Defendants state the following:

- 1. Without the requested extension, the Defendants' answer or other responsive pleading is due June 30, 2014.
 - 2. No previous motion for extension of time has been made.
- 3. The extension is requested as counsel for Defendants is still gathering information necessary to respond to the Complaint.
- 4. Plaintiff is *pro se*. Counsel for Defendants has attempted to contact Plaintiff by telephone, and left a voicemail message for Plaintiff to return his call. As of the filing of this Motion, Defendants' counsel has not heard back from Plaintiff and therefore does not know whether Plaintiff agrees or objects to the requested extension.

- 5. There are no scheduled trial or other deadlines, and therefore the granting of this Motion will not have any impact on other deadlines.
- 6. Defendants request an extension of 14 days, or until July 14, 2014, to answer or otherwise respond to the Complaint.
 - 7. A proposed Order granting this Motion is being submitted with the Motion.

WHEREFORE Defendants Encore Capital Group and Midland Funding request an extension of 14 days, until July 14, 2014, to answer or otherwise respond to the Complaint.

Respectfully submitted,

DOERNER, SAUNDERS, DANIEL & ANDERSON, L.L.P.

/s/Jon E. Brightmire

Jon E. Brightmire, OBA No. 11623 Two West Second Street, Suite 700 Tulsa, OK 74103-3117 (918) 582-1211 – Telephone (918) 925-5258 – Facsimile jbrightmire@dsda.com Attorneys for Midland Funding, LLC and Encore Capital Group.

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Insert all e-mail addresses here

I further certify that on June 30, 2014, I served the foregoing document on the following, who are not registered participants of the ECF System, by U.S. Mail, postage prepaid, to:

Raymond Walker 450282 E. 953rd Road Vian, Oklahoma 74962

/s/Jon E. Brightmire

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